REMARKS

The Office Action of August 1, 2008 was received and carefully reviewed. Claims 87, 88, 90-92, 123, 124, 126-128, 137, 143 and 149 were pending prior to the instant amendment. By this amendment, claims 87, 92, 123, 128 and 149 are amended. Consequently, claims 87, 88, 90-92, 123, 124, 126-128, 137, 143 and 149 are currently pending in the instant application. Reconsideration and withdrawal of the currently pending rejections are requested for the reasons advanced in detail below.

Claims 87, 88, 90-92, 123, 124, 126-128, 137, 143 and 149 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. The claims have been amended to further clarify the invention and to obviate the Examiner's concerns. For example, claims 87, 92 and 128 are amended to recite the feature including "said monodomain regions of said first and second thin film transistors" so as to clarify what "said monodomain region" refers to. Additionally, the feature including "wherein said semiconductor device has a S value of 0.03-0.3," has been deleted in claim 123. Claim 149 has been amended to recite the feature "said crystalline semiconductor islands of said first and second thin film transistors" so as to clarify what "said crystalline semiconductor island" refers to. Thus, it is believed that all of the claims are in compliance and Applicant respectfully requests all outstanding rejections under 35 U.S.C. §112, second paragraph be withdrawn.

Claims 87, 88, 90 and 92 were rejected under 35 U.S.C. §103(a) as being unpatentable over Takemura (U.S. Patent No. 5,534,716). Claims 91, 123, 124, 126-128, 137, 143, and 149 were rejected under 35 U.S.C. §103(a) as being unpatentable over Takemura in view of Zhang et al. (U.S. Patent No. 5,403,722, hereinafter Zhang). Takemura

and Zhang, however, fail to render the claimed invention unpatentable. Each of the claims recite a specific combination of features that distinguishes the invention from the prior art in different ways. For example, independent claims 87 and 123 recite a combination that includes, among other things:

> "[a] semiconductor device comprising . . . wherein said crystalline semiconductor island of said second thin film transistor includes nickel at a concentration of 1 x 10^{16} cm^{-3} or less . . ."

Support for these features are found, at least, in Applicant's originally filed specification, for example, at page 27, first paragraph. At the very least, Takemura and Zhang, whether taken alone or in combination, fail to disclose or suggest any of these exemplary features recited in independent claims 87 and 123.

At best, Takemura merely discloses a nickel concentration in the active layer regions 110 and 111 of the pixel region, and the driver circuit region is about 10^{17} to 10^{20} $atom/cm^3$ (e.g., see col. 6, lines 47-64, of Takemura). Thus, Takemura fails to disclose or fairly suggest at least the above features, either inherently or explicitly. Zhang fails to cure the deficiencies of Takemura, since it does not provide a disclosure of the missing elements either inherently or explicitly.

In accordance with the M.P.E.P. § 2143.03, to establish a *prima facie* case of obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 409 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 196 (CCPA 1970). Therefore, it is respectfully submitted that neither Takemura nor Zhang, taken alone or in any proper combination, discloses or suggests the subject matter as recited in claims 87 and 123. Hence, withdrawal of the rejection is respectfully requested.

Each of the dependent claims depend from one of independent claims 87 or 123 and are patentable over the cited prior art for at least the same reasons as set forth above with respect to claims 87 and 123.

In addition, each of the dependent claims also recites combinations that are separately patentable.

In view of the foregoing remarks, this claimed invention, as amended, is not rendered obvious in view of the prior art references cited against this application. Applicant therefore requests the entry of this response, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

In discussing the specification, claims, and drawings in this response, it is to be understood that Applicant in no way intends to limit the scope of the claims to any exemplary embodiments described in the specification and/or shown in the drawings. Rather, Applicant is entitled to have the claims interpreted broadly, to the maximum extent permitted by statute, regulation, and applicable case law.

Should the Examiner believe that a telephone conference would expedite issuance of the application, the Examiner is respectfully invited to telephone the undersigned patent agent at (202) 585-8316.

Respectfully submitted,

NIXON PEABODY, LLP

/Marc W. Butler, Reg. #50,219/
Marc W. Butler
Registration No. 50,219

NIXON PEABODY LLP
CUSTOMER NO.: 22204
401 9th Street, N.W., Suite 900
Washington, DC 20004
Tel: 202-585-8000
Fax: 202-585-8080